

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA

v.

Case No. 1:24-mj-92

ANTONIO TOWN,

Defendant.

**AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Officer Laura Duque-Badillo, of the Pentagon Force Protection Agency ("PFPA"),
being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been a police officer for the Pentagon Force Protection Agency since March 16th, 2020.
2. I am a graduate of the Uniformed Police Training Program (UPTP) at the Federal Law Enforcement Training Center in Glynco, Georgia.
3. My duties include conducting mobile patrols, traffic stops, and field interviews. My duties further include ensuring building security and performing other law enforcement and security related functions at the Pentagon and other facilities owned, leased, occupied, or otherwise controlled by the Department of Defense.
4. The facts and information contained in this affidavit are based upon my personal knowledge, training, and experience, as well as information and evidence obtained from other law enforcement officials and witnesses. All observations I did not personally make were relayed to me by the individuals who made them or come from my review of records, documents, and other

physical evidence obtained during the course of this investigation. This affidavit contains information necessary to support probable cause for this application. It is not intended to include each and every fact and matter observed by me or known to the government.

PROBABLE CAUSE

5. At approximately 6:20 AM on March 10th, 2024, I observed a silver Hyundai traveling the wrong way down on a one-way road on the Pentagon Reservation.

6. I initiated a traffic stop and identified the driver as ANTONIO TOWN. A VCIN/NCIC check revealed that TOWN's Virginia driver's license was suspended.

7. As TOWN did not have a valid driver's license and was the sole occupant of the vehicle, it was determined that his vehicle would be towed and impounded.

8. TOWN was advised to retrieve any personal items of value from the vehicle. Once he did so, I conducted an inventory search of the vehicle prior to it being towed and impounded in order to safeguard and account for the property. During this search, I located a SCCY, model CPX-2, 9-millimeter firearm bearing serial number 322278 underneath the front passenger's seat. The weapon was loaded with six 9-millimeter rounds in total, with one round in the chamber. TOWN denied knowledge of the firearm.

9. A search incident to TOWN's arrest for possessing a weapon on the Pentagon Reservation, in violation of 32 CFR § 234.10 (a)(1), revealed that TOWN had an additional 9-millimeter round in the front left pocket of the pants he was wearing.

10. A criminal history check revealed that on September 26, 2013, TOWN was convicted of two felony offenses in the Prince William County Circuit Court in Virginia, namely: (1) Grand Larceny, in violation of Virginia Code § 18.2-95; and (2) Burglary, in violation of

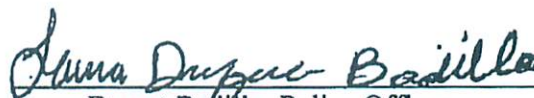
Virginia Code § 18.2-91. Each of these offenses is punishable by a term of imprisonment in excess of one year.

11. Open-source research reflects that SCCY firearms are not manufactured in the Commonwealth of Virginia.

12. After being advised of his *Miranda* rights, TOWN elected to speak with law enforcement. TOWN admitted that he was aware that he was a convicted felon. TOWN further admitted he was aware that there was a firearm underneath the passenger seat. TOWN claimed that a friend had placed the firearm under the seat. TOWN claimed that he had removed a round from the chamber and put that round in his pocket.

CONCLUSION

Based upon the foregoing facts, I submit there is probable cause to believe that, on or about March 10, 2024, within the Eastern District of Virginia, Antonio Town possessed a firearm knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of 18 U.S.C. § 922(g)(1).



Laura Duque-Baillio, Police Officer
Pentagon Force Protection Agency

Respectfully submitted and attested to in accordance with the requirements of Fed. R. Crim. P. 4.1 via telephone on March 11, 2024.



The Honorable William E. Fitzpatrick
United States Magistrate Judge